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SCHNEIDER DOCK & INTERMODAL
7 FACILITY, INC., RYAN SCHNEIDER,
DAVID SCHNEIDER and SCHNEIDER
8 DOCK INDUSTRIAL PARK LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

13 CALIFORNIANS FOR ALTERNATIVES
14 TO TOXICS,

15 Plaintiff,

16 v.

17 SCHNEIDER DOCK & INTERMODAL
FACILITY, INC., RYAN SCHNEIDER,
18 DAVID SCHNEIDER and SCHNEIDER
DOCK INDUSTRIAL PARK LLC

19
20 Defendants.

No. 3:17-cv-05287-JST

**STIPULATION TO CONTINUE EXPERT
DISCLOSURE DEADLINE BY SEVEN
DAYS, TO NOVEMBER 2, 2018;
[PROPOSED] ORDER THEREON**

Judge: Hon. John S. Tigar

22 Plaintiff Californians for Alternatives to Toxics ("Plaintiff"), and Defendants Schneider
23 Dock & Intermodal Facility, Inc., Ryan Schneider, David Schneider, and Schneider Dock
24 Industrial Park ("Defendants"), by and through their respective counsel, stipulate and agree as
25 follows. Plaintiff and Defendants are referred to collectively herein as the "Parties."

26
27 1. WHEREAS on January 3, 2018, the Court issued a Scheduling Order, which *inter*
28 *alia*, set October 26, 2018 as the deadline for expert disclosures; (Docket No. 35);

1 2. WHEREAS the Parties are engaged in ongoing settlement discussions;

2 3. WHEREAS the Parties desire to avoid the potential costs of preparing expert
3 reports should this matter settle before disclosure; and

4 4. WHEREAS the Parties agree to extend the deadline to exchange expert
5 disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) from October 26, 2018 to
6 November 2, 2018; and,

7 5. WHEREAS no previous extensions to this deadline have been sought.

8 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through
9 the Parties hereto through their undersigned counsel of record, that the Parties shall exchange
10 their expert disclosures on November 2, 2018.
11

12
13
14 Dated: October 24, 2018

15 **CANNATA, O'TOOLE FICKES &**
16 **OLSON LLP**

17 By: /s/ Therese Y. Cannata
18 THERESE CANNATA
19 Attorneys for Defendants Schneider
20 Dock & Intermodal Facility, Inc. and
21 Ryan Schneider

22 Dated: October 24, 2018

23 **LAW OFFICES OF ANDREW L.**
24 **PACKARD**

25 By: /s/ Andrew Packard
26 ANDREW PACKARD
27 Attorneys for Plaintiff Californians for
28 Alternatives to Toxics
 (Per Local Rule 5-1(i)(3), Mr.
 Packard's concurrence in the filing of
 this document was obtained on
 10.24.18.)

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 25, 2018



JON S. TIGAR
United States District Judge